

John M. Kuker
Branden S. Vilos
Romsa & Kuker, LLC
2123 Pioneer Ave.
Cheyenne, WY 82001
(307) 433-8777-Telephone
(307) 433-9117-facsimile

FILED
U.S. DISTRICT COURT
DISTRICT OF WYOMING

APR 26 2011

Stephan Harris, Clerk
Cheyenne

**UNITED STATES DISTRICT COURT
DISTRICT OF WYOMING**

Docket No. 10-CV-173-D

HOWARD WILLIS)
)
Plaintiff,)
)
vs.)
)
NATIONWIDE ADVANTAGE MORTGAGE,)
)
Defendant.)

DEFENDANT'S MOTION FOR JUDGMENT ON THE PLEADINGS

COMES NOW, Defendant Nationwide Advantage Mortgage Company (hereinafter referred to as "Nationwide"), by and through undersigned counsel Romsa & Kuker, LLC, and hereby submits this Motion for Judgment on the Pleadings as follows:

1. Pursuant to F.R.C.P. 12(c) and 8, Plaintiff has failed to properly assert a claim for which relief may be granted against Defendant Nationwide.
2. In support of its Motion for Judgment on the Pleadings, and attached hereto and incorporated herein by reference, Defendant hereby submits its Memorandum of Points and Authorities in Support of Motion for Judgment on the Pleadings.
3. In addition, Defendant has submitted contemporaneously with this Motion and Memorandum its Proposed Findings of Fact, Conclusions of Law, and order in accordance with U.S.D.C.L.R.7.1.

WHEREFORE, Defendant hereby requests that a Judgment on the Pleadings be granted in its favor and that the case be dismissed with prejudice, and for such other and further relief as the Court deems just and equitable in the premises.

DATED this 26th day of April, 2011.

NATIONWIDE ADVANTAGE MORTGAGE COMPANY,
Defendant

By: 


John M. Kuker; Wyoming Bar #: 6-3452
Branden S. Vilos; Wyoming Bar #: 6-4431
ROMSA & KUKER, LLC
2123 Pioneer Ave.
Cheyenne, WY 82001
(307)433-8777-Telephone
(307)433-9117-Fax
ATTORNEYS FOR DEFENDANT

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing **DEFENDANT'S MOTION FOR JUDGMENT ON THE PLEADINGS** was served upon the following this 26th day of April, 2011, as follows:

Howard Willis
2525 County Road 218
Cheyenne, WY 82009

☒ U.S. MAIL
☐ FED EX
☐ FAX
☐ HAND DELIVERED


ROMSA & KUKER, LLC